

AFFIDAVIT IN SUPPORT OF A COMPLAINT

I, Lori Robinson, having been duly sworn, hereby depose and state:

AGENT BACKGROUND

1. I am a Special Agent with United States Immigration and Customs Enforcement Homeland Security Investigations (“HSI”) and have been so employed since 2014. I am currently assigned to the Manchester, New Hampshire field office. I am authorized to investigate crimes involving violations of Title 18, Title 8, Title 19, and Title 21 of the United States Code (USC). As part of my regular duties as an agent, I investigate criminal violations relating to a broad range of immigration and customs related statutes, including those relating to child exploitation, child pornography, and human trafficking. I have received training in the area of child pornography and child exploitation. I have assisted investigations and executed search warrants involving child exploitation and child pornography offenses, including search warrants of electronic devices. I have received training relating to the trafficking in persons, including sex trafficking, and other offenses.

2. I have participated in investigations of human trafficking, human smuggling, alien harboring, border violations, drug and firearm trafficking, and related offenses. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I have debriefed, and continue to debrief, defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in New Hampshire, nationally, and abroad.

3. From my training and experience, I know that individuals are trafficked for several purposes. Some forms of human trafficking involve involuntary servitude, peonage, debt bondage

and slavery. Victims are often trafficked by force, fraud, and/or coercion. I am familiar with the federal laws regarding human trafficking, including 18 U.S.C. §§ 1591 and 1594 (Sex Trafficking).

4. This affidavit is submitted in support of a criminal complaint charging Ozalias Guilherme with Attempted Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1), b(1) and 1594(a).

5. As described below, there is probable cause to believe that, on November 14, 2024, in and around Manchester, in the District of New Hampshire, Guilherme did knowingly attempt to, in and affecting interstate and foreign commerce, entice, obtain, solicit, and patronize by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

6. This affidavit is based on my personal investigation and investigation by others, including federal and state law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by interviewing witnesses and examining data obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

FACTUAL BACKGROUND

7. Beginning on or about November 14, 2024, law enforcement agents posted an advertisement (the “Advertisement”) on a website commonly used to advertise commercial sex acts.¹ The Advertisement contained images of what appeared to be two young females and the following language:

¹ Based on my training and experience, I know that the Internet is global network of computers, which is a means and facility of interstate commerce. I also know that the website on which the Advertisement was posted is viewable outside of New Hampshire.

“Sweet & tight! Ready 2 have some fun!”

“In town 4 a limited time only”

“Cute & very petite girl that is tight from head to toe! Cum over to play with me!”

“Text for donations. Incall only – safe and discrete location.”

8. The Advertisement indicated that the person who would perform commercial sex acts was 99 years old.² The Advertisement also contained a contact phone number (the “Advertisement Number”). Law enforcement agents monitored this line and an undercover agent (“UC1”) used it to communicate with potential sex buyers, including Guilherme.

9. On or about November 14, 2024, the Advertisement Number received a text message from a phone number ending in 5484 (the “5484 Number”) in response to the Advertisement. Thereafter, a text conversation between UC1 and the user of the 5484 Number ensued. UC1 stated that he/she had two minor girls—ages 12 and 14 years old—available to perform sex acts in exchange for money. The user of the 5484 Number agreed to pay \$100 to have sex with the 12-year-old girl:

GUILHERME	Hello
UC1	heu
GUILHERME	Are you available now?
UC1	i gota couple of girls. depends o if u want 1 or both. Izzy is 12 yo and Liala is 14yo. Both fun and play well together
GUILHERME	Wya?
GUILHERME	1
UC1	we in manchester tonight and tomorrow. where U? u around?
GUILHERME	Yes How much?
UC1	for how long. Full sex. Anal and bare back are extra. but thats only my 14yo. Who u want?
GUILHERME	Hh

² The law enforcement agents used a website that is known for containing prostitution advertisements but requires users to be at least 18 years old. Based on my training and experience, I know that this website and others like it have been used by traffickers to advertise the commercial sex acts of children under the age of 18.

GUILHERME	Would you mind sending me a picture of both So i can pick one,please
UC1	Izzy is 12 yo and lil tighter and flatter than her sis but loveable [picture sent] ³
UC1	Laila is 14yo and has more experince and willing to do anal for extra \$50 [picture sent]
UC1	half hr with one is \$150 and then if u want extras. CASH only
GUILHERME	Okay Address
UC1	how far are u from manchester?
UC1	which girl so i know if she available. they in an appt right now.
GUILHERME	Manchester nh or mass?
UC1	nh
GUILHERME	30 min maybe
UC1	that not bad. Queen city area?
UC1	which girl u thinking?
GUILHERME	Address
GUILHERME	Izzy maybe
UC1	ok well can u be sure so i make sure i dont set her up for nuther appt
GUILHERME	I'm sure
UC1	ok cool. can u go to Queensbridge area and let me know when u there. just so we safe and not haveing our customers running in to each other and drawing attention
GUILHERME	Just to make sure Send me a picture with 2 fingers up There's a lot of fake people out there
UC1	hope this is ok she getting ready while her sis finishes up [picture sent]
GUILHERME	Are you affiliated with any type of law enforcement or police?
UC1	no. are u? u gotta tell me
GUILHERME	Also can you send me the address for queensbridge
GUILHERME	No Im not
UC1	cool. we just trying to make a living
GUILHERME	I asked you a izzy picture and you send me laila picture
GUILHERME	Send me the address
UC1	u understand we trying to be safe i hope. can u like chill at the cvs near us at 432 s main manchested

³ Photographs sent did not depict actual minors.

UC1	oh sorry bout pic this is izzy [picture sent]
GUILHERME	2 fingers up
UC1	oh shit. sorry. she was working. hold on
UC1	hope this works. last one i am sending [picture sent]
GUILHERME	Yes
GUILHERME	I will let you know when I'm close
GUILHERME	Is she clean and on birth control?
UC1	yes and yes. you ddf?
UC1	k thanks for understanding cuz like we trying be cool and safe
GUILHERME	Sure
GUILHERME	And who are you?men or girl?
GUILHERME	Is that okay if we do it without of condom?i hate condom Also would do it for 100 for 15 mins please?
UC1	i am momma so i a chick for sure
UC1	bare with izzy is extra \$50 and thats fine. 30 mins with her and extra is \$225 cash. is that cool
GUILHERME	I only have 100 Can you do this once please?promise that i will be quickly
UC1	if u go to cvs and show me with pic u legit there i would do 20 mins bare for u cuz u been cool with us. we just dont want any trouble
UC1	if you are in let me know when u leave
GUILHERME	Just getting a gas and be on the way
GUILHERME	Do you play too?
UC1	just a manager these days sweetie but no i dont.
GUILHERME	So will be a car date right?
UC1	sweetie we have a nice room but i would meet ya outside so we both cool with each other. i give u key and u go up and when u done u pay on way out
GUILHERME	I get scared on that We should do car fan on the first meet
GUILHERME	Because one of my friends got caught
UC1	Well how about this. i come down for a smoke. we talk and if i dont think u bat shit crazy i have my girl come down and do car date. but like car stays off so u dont drive away with her
UC1	i get that. again. not trying to draw attention or get caught by cops
GUILHERME	I know but i have tinted windows I'm cool You trying make it for living and I want to have fun
GUILHERME	Thats all

UC1	i am cool with car date long as we talk first, then i have her come down and the car stays turned off and i right outside it smoking.
UC1	thats how it gotta be cuz i dont wanna be freaked out by you
UC1	i am already doing u a deal so u gotta work with me some
GUILHERME	Okay
UC1	let me know when u send pic of cvs . thanx
GUILHERME	Okay
UC1	we we are on? I have her get ready?
GUILHERME	Yes On my way
UC1	cool
GUILHERME	What is she going to be wearing for me?
UC1	if she gotta walk out. Prob some shorts and a tank. she cant be drawing attention in her undies lol
GUILHERME	Okay
GUILHERME	Are you there?
UC1	yeah. u at cvs?
GUILHERME	Yes [picture depicting CVS sent]
GUILHERME	Where do i go now?
UC1	ok u r cool dude legit
GUILHERME	I am
GUILHERME	Are you?
UC1	i think so lol
GUILHERME	?
UC1	hold second looking up address lol. not from here
GUILHERME	Hotel?

10. UC1 then provided Guilherme the address of a hotel in Manchester, NH⁴ (the “Hotel”) as the location of the date with the 12-year-old girl. At the Hotel, there was another undercover agent (“UC2”), who was posing as the person who posted the Advertisement and the user of the Advertisement Number. Shortly thereafter, a White Toyota Camry pulled into the back area of the Hotel parking lot, turned around and exited the lot. Moments later, the White Toyota Camry returned to the Hotel parking lot. The White Toyota Camry was driven by Guilherme who

⁴ The hotel is part of a national chain of hotels.

parked his vehicle in the back area of the parking lot of the Hotel. After UC2 approached the vehicle, Guilherme rolled down his window and had a conversation with UC2. During the conversation, Guilherme confirmed that he wanted “bare” and was not into anything “rough.” In response to a question about age, UC2 said “she’s 12.” He also showed UC2 cash.

11. Law enforcement then arrested Guilherme and took him into custody. A cellphone was in the vehicle on the driver’s seat. Law enforcement officers called the number that UC1 had been using to communicate with Guilherme twice and did not hear the phone ring.

12. During a search of the vehicle, officers located a handgun in the passenger side seat pocket. The handgun was loaded but there was no round in the chamber.

CONCLUSION

13. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging Guilherme with attempted sex trafficking of a minor, in violation of Title 18, United States Code, Sections 1591(a)(1), b(1) and 1594 (attempted sex trafficking of a minor).

/s/ Lori Robinson
Lori Robinson, Special Agent
Homeland Security Investigations

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by phone, on this 15 day of November 2024.




HONORABLE ANDREA K. JOHNSTONE
UNITED STATES MAGISTRATE JUDGE